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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CIVIL ACTION NO. CV 13-02340-SBA
)	
Plaintiff,)	
)	
v.)	STIPULATION TO DISMISS; AND
)	[PROPOSED] ORDER
)	
REUNION MORTGAGE, INC.; R. KENT)	
HARVEY; AND DAVID THAYER,)	
)	
Defendants.)	
)	

IT IS HEREBY STIPULATED by the United States of America and Defendants Reunion Mortgage, Inc., R. Kent Harvey, and David Thayer (collectively, the Parties), through undersigned counsel, that:

1. Pursuant to Fed. R. Civ. R. 41(a)(1)(A)(ii) and subject to the terms of the May 16, 2014 settlement agreement (Settlement Agreement) executed by the Parties, the United States of America dismisses with prejudice all claims asserted by the United States in this action.

STIPULATION TO DISMISS
U.S. V. REUNION MORTGAGE, INC. ET AL. (SBA)

2. The Parties request that the status conference scheduled for May 28, 2014, be vacated.

3. According to the terms of the Settlement Agreement, this Court retains jurisdiction over any disputes that may arise relating to the Settlement Agreement.

Respectfully submitted,

MELINDA HAAG
United States Attorney

Dated: May 21, 2014

By: _____/s/_____
ILA C. DEISS
Assistant United States Attorney
Counsel for the United States

Dated: May 21, 2014

By: _____/s/_____
JOSHUA A. ROSENTHAL
Counsel for Defendants

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:


1. Pursuant to the terms and conditions of the Parties' May 16, 2014 Settlement Agreement, all claims asserted by the United States are dismissed with prejudice.

2. The status conference scheduled for May 28, 2014, is vacated.

3. The clerk shall close the file.

4. The Court shall retain jurisdiction over any disputes that may arise relating to the Parties' May 16, 2014 Settlement Agreement.

Dated: 5/21/2014


HON. SAUNDRA B. ARMSTRONG
United States District Judge